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18 *Counsel for Defendant Tezos Stiftung*

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21 IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

CLASS ACTION

22 This document relates to:

23 ALL ACTIONS.

**STIPULATION AND [PROPOSED]
ORDER SETTING BRIEFING
SCHEDULE AND CONTINUING
HEARING ON MOTION FOR CLASS
CERTIFICATION**

1 WHEREAS, on March 16, 2018, this Court appointed Arman Anvari lead plaintiff in this
2 action (Dkt. No. 101);

3 WHEREAS, on September 6, 2018, this Court set April 24, 2019 as the hearing date for
4 lead plaintiff's motion for class certification (Dkt. No. 165);

5 WHEREAS, the parties have propounded discovery requests on each other, and such
6 discovery is ongoing;

7 WHEREAS, on November 21, 2018, lead plaintiff added Pumaro LLC ("Pumaro") as an
8 additional named plaintiff (Dkt. No. 183), and defendants thereafter propounded discovery
9 requests to Pumaro;

10 WHEREAS, on January 7, 2019, plaintiffs added Artiom Frunze ("Frunze") as an
11 additional named plaintiff (Dkt. No. 186), and defendants thereafter propounded discovery
12 requests to Frunze;

13 WHEREAS, on January 23, 2019, plaintiffs filed a motion for class certification, seeking
14 the appointment of Pumaro and Frunze as class representatives (the "Class Certification
15 Motion") (Dkt. No. 193);

16 WHEREAS, the current deadlines for defendants to file opposition papers and for
17 plaintiffs to file reply papers in connection with the Class Certification Motion are, respectively,
18 February 6, 2019 and February 13, 2019;

19 WHEREAS, on January 25, 2019, plaintiffs filed a motion to withdraw Anvari as lead
20 plaintiff and to substitute Frunze as lead plaintiff (the "Substitution Motion") (Dkt. No. 196);

21 WHEREAS, in light of the recent addition of named plaintiffs, the proposed withdrawal
22 of lead plaintiff Anvari, the pendency of the Substitution Motion, and the ongoing nature of
23 discovery that the parties have served, the parties believe that it would be appropriate to continue
24 the hearing on the Class Certification Motion and to set a briefing schedule that will allow the
25 parties adequate time to complete relevant discovery and to brief relevant issues in advance of
26 the hearing date; and

27 WHEREAS, this is the parties' first request to modify the schedule in connection with
28 plaintiffs' Class Certification Motion;

1 IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval, by the
2 undersigned counsel on behalf of all parties as follows:

- 3 1. Defendants shall file their opposition to the Class Certification Motion on or
4 before May 15, 2019;
- 5 2. Plaintiffs shall file their reply in support of the Class Certification Motion on or
6 before July 15, 2019;
- 7 3. The hearing on the Class Certification Motion shall be continued to July 31, 2019,
8 at 1:30 p.m., or such other date as is convenient for the Court; and
- 9 4. Except as expressly set forth herein, nothing in this stipulation shall be construed
10 as waiving any of the parties' rights, including in connection with the Substitution
11 Motion.

1 Dated: January 30, 2019

Respectfully submitted,

DAVIS POLK & WARDWELL LLP

3 By: /s/ Neal A. Potischman

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1 Dated: January 30, 2019

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1 Dated: January 30, 2019

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12 *Attorneys for Defendant*
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14 Dated: January 30, 2019

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27 *Dynamic Ledger Solutions, Inc.,*
28 *Arthur Breitman, and Kathleen Breitman*

FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, Neal A. Potischman hereby attests that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: January 30, 2019

/s/ Neal A. Potischman

Neal A. Potischman

* * *

[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: _____

HONORABLE RICHARD SEEBORG
U.S. DISTRICT JUDGE